

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ANANT SARASWAT IN SUPPORT OF  
DEFENDANT GOOGLE LLC'S OPPOSITION TO PLAINTIFF'S MOTION  
FOR LEAVE TO SUPPLEMENT INFRINGEMENT CONTENTIONS  
TO CITE ACCUSED SOURCE CODE**

I, Anant Saraswat, declare and state as follows:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and admitted to practice before this Court. I am an attorney at the law firm of Wolf, Greenfield & Sacks, P.C. and counsel for Defendant Google LLC (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Opposition to Plaintiff’s Motion for Leave to Supplement Infringement Contentions to Cite Accused Source Code. I have personal knowledge of the facts stated here and, if called as a witness, I could testify to them competently under oath.

3. Singular reviewed Google’s source code several times in December 2020.

4. Singular did not supplement its infringement contentions to incorporate references to source code before March 1, 2021.

5. Singular reviewed the source code again several times in July 2021.

6. During the stay, Singular reviewed the source code again on August 31, 2021, and on September 1, 2021.

7. After the stay was lifted, Singular reviewed the source code again on July 8, 2022, and July 11, 2022.

8. On July 27, 2022, Google provided to Singular printouts of certain source code files requested by Singular. Of the 60 files for which Google provided source code printouts<sup>1</sup> on July 27, 2022, all but four files have been on Google’s source code review computers since November 2020. The remaining four files were added to Google’s source code review computer in July 2021.

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<sup>1</sup> Google provided complete printouts of 56 files and provided shorter excerpts requested by Singular for the remaining 4 files.

9. I reviewed the printed source code files that correspond to the citations in Singular's proposed supplemental infringement contentions.

10. Singular cites 224 pages to support the asserted patents' "low precision high dynamic range (LPHDR) execution unit" limitations. *See, e.g.*, Dkt. No. 355-15 at p. 7 (citing "GOOG-SING-SC-000001-10, 13-30, 33-61, 228-292, 315-373, 396-444, 449-454"). Although the page ranges recited in Singular's proposed supplemental infringement contentions indicate that Singular cites a total of 236 pages of source code, 12 of those pages (pages GOOG-SING-SC-000435-441 and GOOG-SING-SC-000452-456) do not actually exist because those page numbers were not used in the source code printouts Google provided to Singular. The 224 existing pages span across 30 separate source code files.

11. The pages that Singular cites to support the '156 patent's "at least one first computing device adapted to control..." limitation comprise 23 separate source code files.

12. Google produced source code most recently in July 2021. Google's July 2021 production of source code amounted to less than two hundred out of the more than one thousand source code files that Google produced overall.

13. All of the source code Singular requested to print had been on Google's source code computers since July 2021, and the vast majority of those files (56 of 60) had been available since November 2020. The pages cited in Singular's proposed supplemental infringement contentions span across 54 of the 60 files that Singular requested to print, and of those 54 files, 50 had been available on Google's source code computers since November 2020.

14. Attached as **Exhibit 1** is a true and correct copy of a letter from Matthias Kamber to Paul Hayes, dated September 11, 2020.

15. Attached as **Exhibit 2** is a true and correct copy of a letter from Matthias Kamber to Brian Seeve, dated September 21, 2020.

16. Attached as **Exhibit 3** is a true and correct copy of a letter from Brian Seeve to Matthias Kamber, dated September 25, 2020.

17. Attached as **Exhibit 4** is a true and correct copy of an email from Matthias Kamber to Brian Seeve, sent July 9, 2021.

18. Attached as **Exhibit 5** is a true and correct copy of an email from Nathan Speed to Kevin Gannon, sent August 11, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 25, 2022, at Boston, Massachusetts

/s/ Anant Saraswat  
Anant Saraswat

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed